Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN

In the Matter of	)	
	)	
Implementation of the	)	CC Docket No. 96-115
Telecommunications Act of 1996	)	
	)	
Telecommunications Carriers' Use	)	
of Customer Proprietary Network	)	
Information and Other	)	
Customer Information	)	

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BELLSOUTH REPLY COMMENTS

BellSouth Corporation

M. Robert Sutherland
A. Kirven Gilbert III

Its Attorneys

Suite 1700
1155 Peachtree Street, N. E.
Atlanta, Georgia 30309-3610
(404) 249-3388

DATE: June 26, 1996

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TABLE OF CONTENTS

SUMMARY

But for those with agendas at odds with the Act, commenting parties generally agreed that Section 222 can and should be construed broadly. A number of parties demonstrated that a broad interpretation of "telecommunication service" and implied consent or "opt-out" approval processes are most consistent with both the purpose of the Act and with customers' reasonable expectations of business's use of information about the customer-supplier relationship. Even parties supporting or accepting the broad service categories proposed in the Notice conceded that the proposed restrictions are already becoming blurred by changes in technology and regulation. Proposals for even narrower service categories should be rejected as both anticompetive and contrary to customer interests.

The express terms of Section 222 and supporting statutory construction compel a conclusion that Section 222 applies evenly to "every telecommunications carrier." Assertions that ILECs' or BOCs' customers have greater privacy expectations than those of other carriers are not supported and, in fact, are contradicted by the data shared by Cincinnati Bell. Experience under Computer III CPNI rules, which are much like the broad interpretation of Section 222 supported by most parties, also demonstrates that ILECs and BOCs need no more restrictive CPNI rules than other carriers. Finally, resale carriers' interests in protecting information are expressly and adequately protected by Sections 222(a) and 222(b). Rules to implement these

provisions are neither necessary nor properly before the Commission in this proceeding.

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BELLSOUTH REPLY COMMENTS

BellSouth Corporation, on behalf of BellSouth Enterprises, Inc., BellSouth Telecommunications, Inc. and their affiliated companies ("BellSouth"), hereby responds to comments[1] submitted pursuant to the Commission's Notice in the above referenced proceeding.[2]

But for those with agendas at odds with the Act,[3] commenting parties generally agreed that Section 222[4] can and should be construed broadly[5] in order to achieve the

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[1] A list of commenting parties and abbreviations used herein appears in Appendix A.

[2] Implementation of the Telecommunication Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Notice of Proposed Rulemaking, CC Docket No. 96-115, FCC 96-221 (May 17, 1996) ("Notice").

[3] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. §§ 151 et seq. ("the Act" or "the 1996 Act").

[4] 1996 Act, Section 702, codified at 47 U.S.C. § 222.

[5] The following commenting parties supported, or advocated broader service categories than, the broad categories proposed in the Notice: Ameritech at 3; Bell Atlantic 3-7; NYNEX at 7-13; Pacific at 3-5; SBC at 5-9; US West at 4-7; ALLTEL at 3-5; Cincinnati Bell at 3-7; Frontier at 3-5; GTE at 10-16; USTA at 2-5; AT&T at 5-11;

Act's and this Commission's dual objectives in this proceeding: promoting competition in all segments of the telecommunications industry while accommodating customers' reasonable expectations of privacy.[6] Parties supporting a broad interpretation uniformly recognized the disservice to customers and to competition that would flow from an unduly restrictive construction, such as identification of narrow or rigid telecommunications service baskets or imposition of prior written authorization requirements as a precondition to internal use of information by carriers and their affiliates. Either of these restrictive constructions alone would materially hamper carriers' abilities to become competitive one-stop shopping sources for their customers, directly contrary to the objectives of the Act. And certainly, adoption of both would render one-stop shopping a practical impossibility altogether.

Similarly, a number of parties,[7] including BellSouth, demonstrated that a broad interpretation of "telecommunication service" and implied consent or "opt-out" approval processes are most consistent with customers' reasonable expectations of business's use of information about the customer-supplier relationship. Several parties[8] cited this Commission's and/or NTIA's independent but comparable past conclusions that customers generally may be presumed to accede to business's internal use of customer-related information or sharing among affiliates for purposes of developing or

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CompTel at 5; Excel at 3; MCI at 3-7; Sprint at 2-4; LDDS at 6-8; Airtouch at 2-4; PageNet at 2; PCIA at 3-4; California at 6-7; Washington at 4-5; AICC at 9.

[6] Notice at ¶ 2, 15; Joint Statement of Managers, S. Conf. Rep. No. 104-230, 104th Cong., 2d Sess. 205 (1996) ("Joint Explanatory Statement").

[7] Bell Atlantic at 3-9; NYNEX at 16; Pacific at 7-12; SBC at 8-9; U S West at 15-19; Cincinnati Bell at 7; USTA at 4-6; AT&T at 12-16; Sprint at 3.

[8] Pacific at 7-8; SBC at 8-9; BellSouth at 9, 14-17, 19-20; U S West at 16.

offering improved products, services, and integrated packages, absent some affirmative indication to the contrary. Commenting parties were also in general agreement that customers do not as readily accept that a carrier or any other business will disclose information to a non-affiliate absent prior express consent. As BellSouth observed in its Comments, Section 222 -- read in context as part of comprehensive legislation intended to "decompartmentalize" the telecommunications industry and eliminate "balkanized enclaves" -- should be interpreted in a manner that presumptively permits internal use of CPNI, affords customers an opportunity to restrict such use, and requires disclosure of such information to nonaffiliated parties only upon affirmative written authorization from the customer.[9]

I. Broad Interpretation of Section 222 Is Most Consistent With the Purpose and Objectives of the Act

A number of parties agreed with BellSouth that the Act's pro-competition and privacy protection objectives, when viewed form the perspective of customer expectations, compel a regulatory environment that allows carriers to be responsive to those expectations. As Cincinnati Bell's data[10] confirms, customers desire the benefits to them of a carrier's internal use of information about the business relationship. Section 222 must be construed in a way that does not inhibit carriers' abilities to meet those expectations.

[9] BellSouth at 25.
[10] Cincinnati Bell at Appendix A.

A construction of Section 222 that gives broad meaning to the term "telecommunications service" as used in that section received substantial support.[11] Indeed, multiple parties[12] in addition to BellSouth argued that the most appropriate construction is one that accommodates the range of telephony products and services that a carrier may offer individually or as components of an integrated package. As several parties observed, the Commission has long recognized that one-stop shopping and packaging of telecommunications service offerings are efficient and in the public interest.[13] The Commission should not retract from that policy in the face of legislation expressly intended to improve the availability of such options to customers.

Even parties who generally supported or accepted the "traditionally distinct service" categories proposed in the Notice acknowledged that the very "traditions" upon which such distinctions are based are artificial and short-lived, as changes in technology and regulation are even now beginning to render the distinctions meaningless.[14] Indeed, as BellSouth demonstrated, it is the very purpose of the Act to "decompartmentalize" the "balkanized enclaves" of discrete service and provider categorizations.[15] Rather than adopt a service category approach based on outmoded and unnatural service or provider distinctions -- one which even its proponents concede would soon need to be revisited -- the Commission should construe the Section 222 in

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[11] See note 3, supra.

[12] BellSouth at 7-10; U S West at 4-7; SBC at 5-9; AT&T at 5-11.

[13] SWB at 8, n.6; AT&T at 9-11; Ameritech at 4-6. Bell Atlantic at 6-9.

[14] NYNEX at 10-11; Pacific at 3-5; BellSouth at 10-12; Comptel at 5; MCI at 3-6; Sprint at 2-4.

[15] BellSouth at 6 (quoting Representative Fields, 142 Cong. Rec. H1149 (Feb. 1, 1996) and Senator Pressler, 141 Cong. Rec. S7881-2, S7886 (June 7, 1995)).

a manner that grants carriers the flexibility to be responsive to customer expectations consistent with the Act's purpose

Only a few parties advocated service categories narrower than those proposed in the Notice. For example, Arch Communications, a narrowband PCS licensee, supported the proposal to treat CMRS as a category separate from local service and interexchange service, and also encouraged the Commission to further divide CMRS between narrowband and broadband CMRS services.[16] The objective behind such recommendations is transparent: to stifle the ability of potential competitors to enter a particular market sector by erecting artificial barriers to efficient customer service. Narrow service categories are thus plainly at odds with the purpose of the Act.

Narrow service categories would also have the potential to severely disrupt a carrier's ability to structure its operations in an efficient manner. The narrower the service categories, of course, the more categories that would have to be established. The more categories that are established, the more approvals a carrier with a full range of products may need to obtain and maintain to market its services across the respective category boundaries. This potential for multiple approvals for multiple cross-boundary marketing permutations could lead to confusion for both customers and carriers alike.[17] Indeed, as MCI observed, "the fact that the same [carrier] personnel will probably be involved in long distance, enhanced service and other competitive

[16] Arch Communications at 5-7.

[17] For example, a customer may have granted approval for use of CPNI from baskets A, B, C, and D to market services in baskets E and F, and information from baskets E and F to market services in basket G, but not information from A, B, or C to market service in basket D or G.

service marketing, often in the same call to the customer mak[es] different levels of access restrictiveness unworkable "[18] The Commission should seek to avoid such an unworkable implementation of the Act

Finally, BellSouth agrees with those parties who urge the Commission to construe Section 222 as permitting the use of CPNI in the marketing of CPE and certain, if not all, enhanced services.[19] In many instances, the service is partly defined by the use of the associated CPE. For instance Caller ID devices, CMRS handsets, and paging equipment are from the customer's perspective essential adjuncts to the workings of the service Similarly, voice messaging service offered by carriers are viewed by customers just as any other communication service, particularly in states where it must be offered under tariff

Nor is the view that voice messaging service should be considered part of the underlying service basket limited to large wireline service providers. For example, CMRS licensee PageNet, in supporting the Commission's proposal to identify CMRS as a distinct service category, nonetheless concludes that even within such a service category, "PageNet will be able to use CPNI from its paging service to pinpoint prospects for its VoiceNow service. The ability to identify likely subscribers will reduce PageNet's marketing costs. This will enable PageNet to penetrate the market for voicemail more quickly, recover its sizable fixed costs of providing that service sooner, and enable it to better serve the public "[20] These are precisely the reasons voice

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[18] MCI at 18 (emphasis added).
[19] Pacific at 4; Ameritech at 2-7; Bell Atlantic at 3-4; US West at 14-15; GTE at 12.
[20] PageNet at 2-3.

messaging and similar services should be considered part of the underlying service basket for any carrier.

II. Any Rules Adopted in this Proceeding Should Apply Evenly to All Telecommunications Carriers

The plain language of Section 222 dictates that this section applies to "every telecommunications carrier."[21] Nonetheless, several parties have contrived arguments to suggest that the Commission should overlook this express direction and prescribe rules that differ among carriers and that impose greater restrictions on ILECs, in general, or on the BOCs, in particular.[22] As shown below, these arguments, motivated solely by these parties' self-interests, are inconsistent with the Act's goal of protecting customers' reasonable expectations of privacy while promoting competition in all telecommunications market sectors. These attempts to perpetuate the disparate regulatory classifications that historically have contributed to the preservation of "balkanized enclaves" are directly contrary to the intent of Congress and must be rejected by this Commission.

The literal language of Section 222, its internal construction, and its positioning in the structure of the Act as a whole all confirm that Congress has already rejected the notion that ILECs or BOCs must be treated specially under Section 222. Most telling, of course, is that Section 222 by its express terms applies to "every telecommunications carrier." In addition, in contrast with many other sections of the

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[21] 47 U.S.C. § 222(a).

[22] MFS at 2; Teleport at 3-6; IntelCom at 4-5; Cable and Wireless at 5-7; Comptel at 8-11; LDDS at 11-12.

Act, Congress did not instruct the Commission to adopt rules to determine how this section should be implemented or by which carriers. Nor did Congress establish special conditions for exclusion from coverage under Section 222. Indeed, the Commission has previously recognized that the terms of Section 222 are "self-executing,"[23] effectively acknowledging that no carriers are excused from its reach. Congress has thus provided clear instruction that the requirements it established in Section 222 are to apply to all telecommunications carriers.

The Commission, of course, has undertaken this proceeding to provide guidance to carriers as to what those requirements are. Clarifying the requirements imposed on all carriers by the terms of the Act, however, is substantially different from determining whether those requirements should apply differently for certain carriers. Having concluded that the terms of Section 222 are "self-executing", it would be capricious for the Commission now to attempt to clarify the requirements one way for one set of carriers and a different way for another set.

Internal construction of Section 222 also confirms that Congress affirmatively chose to impose one set of CPNI safeguards on all carriers, except where Congress itself expressly recognized limitations. For example, while Sections 222(a), 222(b), 222(c)(1)-(c)(2), and 222(d) impose obligations on all telecommunications carriers,

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[23] See, Amendment of the Commission's Rules to Establish New Personal Communication Services: Pacific Bell, et al., Plan of Non-Structural Safeguards Against Cross-Subsidy and Discrimination, GN Docket No. 90-314, DA 96-256, at ¶ 9 (rel'd Feb. 27, 1996); Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier I Local Exchange Company Safeguards and Rules Governing Telephone Companies' Use of Customer Proprietary Network Information, CC Docket Nos. 90-623, 92-256, FCC 96-222, at ¶ 4 (rel'd May 17, 1996).

without distinguishing among them, Section 222(c)(1)(3) distinguishes between telecommunications carriers, generally, and local exchange carriers, specifically, in the application of rules for handling aggregate CPNI.[24] Similarly, Section 222(e) is limited by its terms to "a telecommunications carrier that provides telephone exchange service."[25] Hence, the internal construction of Section 222 amply demonstrates that where Congress saw a need for varying the CPNI requirements among carriers, it has already done so.

Finally, the inclusion of Section 222 in the 1996 Act as Section 702 of that Act (under "Title VII -- Miscellaneous Provisions") and its placement under Part I of Title II of the Communications Act of 1934, as amended, further reveals Congress's explicit determination that Section 222 applies to all carriers. Had Congress thought it necessary to impose CPNI safeguards solely on ILECs or on ILECs differently from other carriers as a means of achieving some form of competitive equilibrium, it easily could have included such special requirements under the newly created "Part II -- Development of Competitive Markets." Alternatively, if Congress had intended that the CPNI rules apply specially to BOCs, it would have included those provisions in Section 151 of the 1996 Act, which enacts a new Part III of Title II of the Communications Act of

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[24] BellSouth agrees with those who oppose any sort of notification to third parties prior to a LEC's use of aggregate CPNI. See, e.g., NYNEX at 23; SBC at 13-14. BellSouth also opposes APCC's attempt to characterize LEC data regarding traffic volumes, etc., at individual LEC payphones as "aggregate" data. As APCC begrudgingly concedes, APCC at n.1, such data will be the CPNI of the LEC payphone operation after LEC payphones are detariffed pursuant to Section 276 of the Act, 47 U.S.C. § 276. No reason exists to accord that information different treatment now merely because the payphone unit is presently included as part of the LEC's payphone service.

[25] 47 U.S.C. § 222(e).

1934 entitled "Special Provisions Concerning Bell Operating Companies" and which already contains safeguards particular to the BOCs. Instead, Congress placed Section 222 under Part I of Title II, "Common Carrier Regulation," obviously signaling its intent that its CPNI requirements apply evenly across carriers.

Some parties[26] have attempted to overcome the manifest conclusion of this plain reading and statutory construction by arguing that although Section 222 by its terms applies to all carriers, some should be exempt or subject to reduced requirements under the forbearance provisions of Section 10 of the Act or for other reasons. The tack taken by these parties is incredulous. On the one hand, they urge the Commission to adopt a constrictive reading of Section 222 ostensibly to protect customers' purported privacy expectations -- knowing, of course, that carriers subject to such constrictive requirements will be unable to operate efficiently and meet their customers' real expectations. These parties follow up, however, with a claim that, for one reason or another, the constrictive reading of Section 222 that they have advocated would be burdensome and not in the public interest if applied to them. The reasons offered for drawing such a distinction are unfounded.

For example, several assert that the privacy expectation of customers of incumbent LECs is somehow different from the privacy expectations of customers of new competitors.[27] They base this assertion on a claim that ILECs' customers have not voluntarily entered the customer supplier relationship while customers of competing LECs have made a choice of carrier. From there, the conclusion is drawn that only the

[26] See note 22, supra.
[27] See, e.g., IntelCom at 3-4; Comptel at 9.

competing LEC's customers can be deemed to consent to use of CPNI by the carrier. This logic makes sense, however, only if one assumes that the customer's choice of the competing LEC was knowingly based on the new entrant's more liberal use of CPNI. Of course, this is precisely the type of marketing advantage these parties are trying to achieve for themselves: what they would like to be able to do is to claim to customers that they are unconstrained by rules that limit ILECs' use of CPNI and that therefore they are better able to serve their customers' range of needs. In this sense, their argument becomes a self-fulfilling prophesy: customers who are dissatisfied with an ILEC's inability to serve them efficiently migrate *en masse* to the new carrier and the new carrier maintains its argument that its customers have made a choice that absolves the carrier of any responsibility for observation of CPNI constraints.

The fallacies of this circular logic are apparent. First, there is no basis for assuming or concluding that the privacy expectations of a new entrant's customers are any more relaxed than those of an ILEC's customers. Indeed, the data submitted by Cincinnati Bell confirms that, regardless of whether the relationship between the ILEC and the customer is considered to be "voluntary," the overwhelming majority of customers want to be kept aware of the full range of services offered by that carrier or of services that would be of particular interest to the customer.[28] These data are entirely consistent with the Commission's previous findings that "a solicitation to someone with whom a prior business relationship exists does not adversely affect subscriber privacy interests . . . [and that] such a solicitation can be deemed to be

[28] Cincinnati Bell at 7-8, n. 10, Appendix A.

invited or permitted by the subscriber in light of the business relationship."[29] Whether the business relationship is considered to be "voluntary" or not is irrelevant to the customer's reasonable expectations. Accordingly, there can be no presumed difference in privacy expectation as between customers of ILECs and other carriers and therefore no basis for relaxing the CPNI obligations of one but not the other carrier.

Alternatively, some parties argue that more stringent CPNI requirements should apply to ILECs or BOCs because of the alleged potential of these carriers to abuse their access to this information in anticompetitive ways.[30] Others similarly cry for more restrictive rules for ILECs because of their "historical access to vast quantities of CPNI."[31] One need only look to the BOCs' experience operating under the Commission's pre-existing CPNI rules to dispel these claims, however. The BOCs have operated for a number of years under CPNI rules that, for the most part, presume the customer's approval of internal use of CPNI by the carrier and its non-regulated CPE and enhanced service operations. Indeed, for the largest segment of customers, this presumption has been recognized with no attendant requirement of prior notification. Yet, the CPE and enhanced service markets are and remain extraordinarily competitive. No party has even suggested evidence that the Commission's past CPNI policies have resulted in any anticompetitive consequence. Rather, they rely, as they always have, on speculation, conjecture, and worst case scenario hypotheses.

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[29] Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, 7 FCC Rcd 8752, 8770 (1992).

[30] See, e.g., Airtouch at 7; ITAA at 3-5.

[31] Cable and Wireless at i.

As BellSouth has shown,[32] Section 222 -- properly construed to promote both competition and reasonable expectations of privacy -- is substantially similar to the general scheme of the Commission's rules. That is, both sets of requirements seek to facilitate a carrier's internal use of CPNI to satisfy its customers' full range of needs -- and thereby to promote competition through efficient operation and the availability of one-stop shopping -- while reserving for the customer the right to restrict such use, should a customer's desires differ from the norm. Further, both sets of rules place greater emphasis on protecting a customer's records from disclosure to unaffiliated third parties, while still accommodating -- in fact, requiring -- disclosure to third parties on customer request, in furtherance of competition. The experience of the BOCs in operating under these pre-existing, but substantially similar, CPNI provisions thus presents compelling evidence of a lack of need to impose more restrictive requirements on the BOCs, or on ILECs generally, and hence a lack of justification for forbearance of CPNI regulation for some sets of carriers but not others.

Finally, some parties[33] attempt to justify disparate treatment of ILECs on the basis of their role in providing the underlying service for resale carriers. These proposals are also without merit because Section 222 already accommodates the protections these parties are seeking without need for further, more restrictive rules. Specifically, Section 222(a) provides in no uncertain terms that "[e]very telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunications carriers . . . and customers.

[32] BellSouth at 24.

[33] See, e.g., TRA at 8-13; Comptel at 10-11; Cable and Wireless at 12-13.

including telecommunications carriers reselling telecommunications services provided by a telecommunications carrier."[34] Section 222(b) makes the point even more specific: "A telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose and shall not use such information for its own marketing efforts."[35]

Further regulations to "give meaning" to these requirements would be duplicative. Indeed, TRA, one of the main advocates of adoption of regulations under these sections concedes that "the duties and obligations set forth in new Sections 222(a) and 222(b) . . . are remarkably clear and direct."[36] To the extent there is any need for clarification, however, it is only to confirm that the obligations of these sections are imposed on "all telecommunications carriers (including interexchange carriers, local exchange carriers, competitive access providers, competitive local exchange carriers, wireless providers and, for that matter, resale carriers)."[37] Section 222(a) and 222(b)

[34] 47 U.S.C. § 222(a) (emphasis added).
[35] 47 U.S.C. § 222(b).
[36] TRA comments at 9 (emphasis added). TRA also concedes that the Commission has not proposed to adopt any rules implementing Sections 222(a) or 222(b). Id. Hence, it would be procedurally improper for the Commission to adopt such rules without adequate notice.
[37] TRA Comments at 8 (abbreviations omitted). Indeed, in confirming that Section 222 applies evenly to all carriers except where Congress has expressly indicated otherwise, the Commission should emphasize that the requirements of Section 222(c)(2), which requires disclosure of CPNI to third parties upon written customer authorization, preclude "unilateral[] attempt[s] [by interexchange carriers, competitive access providers, competitive local exchange carriers, wireless providers, and resale carriers] to impose discriminatory administrative requirements upon their own customers and their competitors in order to delay or limit disclosure of this data if it will serve [such carrier's] own competitive interests," when presented with valid customer authorization by the incumbent LEC. See Cable and Wireless at 11.

do not provide a basis for disparate regulatory burdens to be imposed on incumbents LECs.

CONCLUSION

For the reasons set forth above and in its Comments, BellSouth urges the Commission to adopt a construction of Section 222 that applies evenly to all carriers and one which presumptively permits internal use of CPNI, affords customers an opportunity to restrict such use, and requires disclosure of such information only upon affirmative written direction from the customer.[38]

Respectfully Submitted,

BELLSOUTH CORPORATION

By: 

M. Robert Sutherland
A. Kirven Gilbert III

Its Attorneys

1155 Peachtree Street, N. E.
Atlanta, Georgia 30309-3386
(404) 249-3388

Date: June 26, 1996

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[38] BellSouth also concurs in YPPA's Reply Comments in response to the arguments of ADP and MCI.

Appendix A

Parties Filing Comments in CC Docket No. 96-115

Airtouch Communications (Airtouch)
Alarm Industry Communications Committee (AICC)
ALLTel Telephone Services Corporation (ALLTEL)
America's Carrier's Telecommunications Association (ACTA)
American Public Communications Council (APCC)
Ameritech
Association of Directory Publishers (ADP)
AT&T Corporation (AT&T)
Arch Communications Group, Inc. (Arch Communications)
Bell Atlantic
Cable & Wireless, Inc. (Cable & Wireless)
Cincinnati Bell Telephone Company (Cincinnati Bell)
Competitive Telecommunications Association (CompTel)
CompuServe Incorporated (CompuServe)
Consumer Federation of America (CFA)
Excel Telecommunications, Inc. (Excel)
Frontier Corporation (Frontier)
GTE Service Corporation (GTE)
Information Technology Association of America (ITAA)
IntelCom Group, Inc. (IntelCom)
MCI Telecommunications Corporation (MCI)
MFS Communications Company (MFS)
National Association of Regulatory Utility Commissioners (NARUC)
New York State Assemblyman Genovesi
NYNEX Telephone Companies (NYNEX)
Pacific Telesis Group (Pacific)
Paging Network, Inc. (PageNet)
Pennsylvania Office of Consumer Advocate (Pa OCA)
People of the State of California and the Public Utilities Commission of California (California)
Personal Communications Industry Association (PCIA)
Public Utilities Commission of Texas (PUCT)
SBC Communicaitons (SBC)
Small Business in Telecommunications, Inc. SBT)
Sprint Corporation (Sprint)
Telecommunications Resellers Association (TRA)
Teleport Communications Group Inc. (Teleport)
United States Telephone Association (USTA)

US West, Inc. (US West)
Virgin Islands Telephone Corporation (Virgin Islands)
Washington Utilities and Transportation Commission (WUTCO)
WorldCom, Inc. d/b/a LDDS WorldCom (LDDS)
Yellow Pages Publishers Association (YPPA)

CERTIFICATE OF SERVICE

I hereby certify that I have this 26th day of June, 1996 served all parties to this action with a copy of the foregoing **REPLY COMMENTS** by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties on the attached service list.

Juanita H. Lee

Juanita H. Lee

CC DOCKET NO. 96-115

Cincinnati Bell Telephone Company
FROST & JACOBS
Thomas E. Taylor
Jack B. Harrison
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

SBC Communications Inc.
James D. Ellis
Robert M. Lynch
David F. Brown
175 E. Houston, Room 1254
San Antonio, TX 78205

Southwestern Bell Telephone Company
Durward D. Dupre
Michael J. Zpevak
Robert J. Gryzmala
One Bell Center, Room 3520
St. Louis, Missouri 63101

NYNEX Telephone Companies
Saul Fisher
Thomas J. Farrelly
1095 Avenue of the Americas
New York, NY 10036

The Bell Atlantic Telephone Companies
Lawrence W. Katz
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201

Ameritech
Alan N. Baker
Michael S. Pabian
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196

Virgin Islands Telephone Corporation
Reed Smith Shaw & McClay
Jonathan E. Canis
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005

Sprint Corporation
Jay C. Keithley
Leon M. Kestenbaum
Norina T. Moy
1850 M Street, N.W.
Suite 1110
Washington, D.C. 20036

Craig T. Smith
Sprint Corporation
P. O. Box 11315
Kansas City, Missouri 64112

U S West, Inc.
Kathryn Marie Krause
Suite 700
1020 19th Street, N.W.
Washington, D.C. 20036

ALLTEL Corporate Services, Inc
Glenn S. Rabin
655 15th Street, N W
Suite 200
Washington, D C 20005

United States Telephone Association
Mary McDermott
Linda Kent
Charles D. Cosson
Keith Townsend
1401 H Street, N W., Suite 600
Washington, D C 20005

NYNEX Telephone Companies
Saul Fisher
Thomas J. Farrelly
1095 Avenue of the Americas
New York, NY 10036

Frontier Corporation
Michael J. Shortley, III
180 South Clinton Avenue
Rochester, NY 14646

Pacific Telesis Group
Lucille M. Mates
Sarah R. Thomas
Patricia L. C. Mahoney
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105

Pacific Telesis Group
Margaret E. Garber
1275 Pennsylvania Avenue, N W
Washington, D C 20004

GTE Service Corporation
Richard McKenna
600 Hidden Ridge
Irving, Texas 75015

GTE Service Corporation
David J. Gudino
1850 M Street, N W.
Suite 1200
Washington, D C 20036

National Association of Regulatory Utility
Commissioners
Paul Rodgers
Charles D. Gray
James Bradford Ramsay
1201 Constitution Avenue, Suite 1102
Post Office Box 684
Washington, D C 20044

Assemblyman Anthony J. Genovesi
Legislative Office Building
Room 456
Albany, NY 12248-0001

People of the State of California and the Public Utilities Commission of the State of California
Peter Arth, Jr
Edward W O'Neill
Mary Mack Adu
505 Van Ness Avenue
San Francisco, CA 94102

Pennsylvania Office of Consumer Advocate
Philip F McClelland
Irwin A Popowsky
Office of Attorney General
1425 Strawberry Square
Harrisburg, PA 17120

Public Utility Commission of Texas
Jackie Follis,
Senior Policy Analyst
Office of Regulatory Affairs
7800 Shoal Creek Boulevard
Austin, TX 78757-1098

American Public Communications Council
DICKSTEIN, SHAPIRO & MORIN, L L P
Albert H. Kramer
Robert F Aldrich
2101 L Street, N W
Washington, D C 20554

Yellow Pages Publishers Association
Halprin, Temple, Goodman and Sugrue
Albert Halprin
Joel Bernstein
1100 New York Avenue, N W
Suite 650E
Washington, D C 20005

Association of Directory Publishers
Theodore Case Whitehouse
Michael F Finn
WILLKIE FARR & GALLAGHER
Three Lafayette Centre
1155 21st Street, N W
Washington, D C 20036

Small Business in Telecommunications
Brown and Schwaninger
Dennis C. Brown
1835 K Street, N W
Suite 650
Washington, D C 20006

Consumer Federation of America
Bradley Stillman, Esq.
1424 16th Street, N W.
Suite 604
Washington, D C 20036

The Alarm Industry Communications Committee
KELLEY DRYE & WARREN, LLP
Danny E. Adams
Steven A. Augustino
1200 Nineteenth Street, N W
Suite 500
Washington, D C 20036

CompuServe Incorporated
5000 Arlington Centre Boulevard
P O Box 20212
Columbus, OH 43220